

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>PERIMETER MALL, LLC,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	<b>CIVIL ACTION FILE NO.</b>
	)	<b>1:21-cv-02091-SCJ</b>
	)	
<b>vs.</b>	)	
	)	
<b>RETAILING ENTERPRISES,</b>	)	
<b>LLC, d/b/a INVICTA</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF’S CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT**

(1) The undersigned counsel of record for a party to this action certifies that Perimeter Mall, LLC (“Plaintiff”) is a Delaware limited liability corporation and is indirectly owned by Brookfield Property REIT Inc. Brookfield Property REIT Inc is a publicly-traded company and a subsidiary of Brookfield Property Partners L.P., also a publicly-held company.

(2) The undersigned further certifies that Plaintiff has members that include other limited liability corporations, limited partnerships, persons, and other non-publicly traded corporations, none of which are required to be disclosed herein and none of which have either a financial interest or other interest which could be substantially affected by the outcome of this particular case

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:

- Luke Kill, Andre Kill & McCarthy, LLP; and
- Jason Morris, Carlton Fields.

Respectfully submitted this 15<sup>th</sup> day of June, 2021.

/s/ Luke A. Kill  
Luke A. Kill  
Georgia Bar No. 457555  
Attorney for Plaintiff

**Andre Kill & McCarthy, LLP**  
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**LOCAL RULE 7.1(D) CERTIFICATION**

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared with Times New Roman, 14-point font.

/s/ Luke A. Kill

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<b>vs.</b>	)	
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<b>RETAILING ENTERPRISES, LLC, d/b/a INVICTA</b>	)	
	)	
<b>Defendant.</b>	)	

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on 15<sup>th</sup> day of June, 2021, I served a true and correct copy of the foregoing document via the CM/ECF system, via electronic mail, and by depositing a copy into the United States mail, with sufficient postage affixed thereto, to counsel of record, addressed as follows:

**Jason A. Morris  
Carlton Fields, P.A.  
1201 West Peachtree Street, Suite 3000  
Atlanta, Georgia 30309-3455**

/s/ Luke A. Kill  
\_\_\_\_\_  
Luke A. Kill  
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